

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

Criminal No. 14-632-1

vs.

GEORGE TRIMIS

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

The Defendant, George Trimis, by his attorney, Anthony Pope, hereby respectfully requests that the Court enter an Order modifying the condition of release, specifically, changing the level of supervision from home detention/electronic monitoring to a curfew.

The within motion is being made on behalf of Defendant, George Trimis and in conjunction with the full support and recommendation of Mr. Trimis's Pretrial Services Officer, Joshua Rothman. Specifically, Officer Rothman has endorsed Mr. Trimis's conditions of release be reduced to a curfew as opposed to home detention/electronic monitoring for the following reasons:

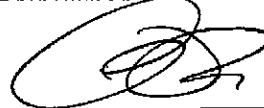
- (1) Mr. Trimis's current employment requires him to work from 6:30 AM to 8:30 PM Monday through Saturday until mid-November. His current employment requires him to travel to various potential work sites and prepare bids for the engineering firm, which does not make it suitable for a person on home detention.
- (2) Additionally, he has a Sunday schedule of 8:00 AM to 6:00 PM to attend religious services and perform various personal errands, such as food shopping and laundry.

Mr. Trimis has complied with the Conditions of Release and has abided by the requirements of the home detention/electronic monitoring.

Therefore, it is Pretrial Services' position that Mr. Trimis is better suited for a curfew instead of home detention/electronic monitoring. The United States of America, by its attorneys Zane David Memeger, United States Attorney, and Judy G. Smith, Assistant United States Attorney, take no position on this request.

Wherefore, based on the foregoing, Defendant, George Trimis, respectfully requests that the Court enter an Order Modifying the Conditions of Release in the form of the proposed Order submitted herewith.

Respectfully Submitted,
THE ANTHONY POPE LAW FIRM, P.C.

A handwritten signature in black ink, appearing to be 'Anthony Pope', written over a horizontal line.

ANTHONY POPE, ESQ.
Attorneys for the Defendant, George Trimis

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ORDER

THIS MATTER, having been opened to the Court by counsel for Defendant, George Trimis, and the Assistant United States Attorney, Judy Smith having taken no position on this order:

IT IS ON THIS _____ day of _____, 2015,

ORDERED that the Order setting Conditions of Release be modified from home detention/electronic monitoring to a curfew; and

IT IS FURTHER ORDERED that same shall take effect immediately.

The Honorable Gene E.K. Pratter
Judge, United States District Court

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2015, I electronically filed the foregoing document with the United States Court of Appeals for the First Circuit by using the CM/ECF system. I certify that the following parties or their counsel of record are registered as ECF Filers and that they will be served by the CM/ECF system:

Judy G. Smith, Esq., judy.smith@usdoj.gov
Robert Altchiler, Esq., altchlaw@aol.com

I further certify that on September 16, 2015, I served a copy of the foregoing document on the following parties or their counsel of record by electronic mail:

Anthony Pope, Esq., apope@apopefirm.com

Dated: September 16, 2015

s/ Daniella Gordon
DANIELLA GORDON
Associate Counsel, George Trimis